

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PEN AMERICAN CENTER, INC.,

*Plaintiff,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States,

*Defendant.*

Civil Action No. 18-cv-9433-LGS

**NOTICE OF MOTION FOR  
LEAVE TO FILE *AMICUS*  
*CURIAE* BRIEF**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the Declaration of Richard Schwed, the *amici curiae* (“*Amici*”) identified below,<sup>1</sup> by their undersigned counsel, will move this Court, before the Honorable Lorna G. Schofield, United States District Judge, at the United States Courthouse located at 40 Foley Square, New York, New York 10007, for entry of an order granting leave to file as *amicus curiae* the proposed brief attached as Exhibit A to the Declaration of Richard Schwed dated as of May 10, 2019. We have conferred with counsel for the parties to the action, and they do not oppose the filing of the proposed *amicus curiae* brief.

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<sup>1</sup> The *Amici* are Ruth Ben-Ghiat, Professor of Italian and History at New York University; Kim Lane Scheppele, the Laurance S. Rockefeller Professor of Sociology and International Affairs at the Woodrow Wilson School and in the University Center for Human Values at Princeton University; Seyla Benhabib, the Eugene Meyer Professor of Political Science and Philosophy at Yale University; Aziz Huq, the Frank and Bernice J. Greenberg Professor of Law at the University of Chicago Law School; and Samuel Moyn, the Henry R. Luce Professor of Jurisprudence and Professor of History at Yale University.

Dated: New York, New York  
May 10, 2019

SHEARMAN & STERLING LLP

By: /s/ Richard Schwed

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 10, 2019, the foregoing Notice of Motion, Memorandum of Law, Declaration, and the Exhibit attached thereto were served by ECF to all counsel of record.

SHEARMAN & STERLING LLP

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Richard Schwed

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